

**California Environmental Protection Agency  
Department of Toxic Substances Control**



**DRAFT NON-RCRA HAZARDOUS WASTE FACILITY  
POST-CLOSURE PERMIT**

Permit Number: 02-BRK-02

Facility Name:  
USS-POSCO Industries  
900 Loveridge Road  
Pittsburg, CA 94565

Owner Name:  
USS-POSCO Industries  
900 Loveridge Road  
Pittsburg, CA 94565

Operator Name:  
USS-POSCO Industries  
900 Loveridge Road  
Pittsburg, CA 94565

EPA ID No: CAD 009 150 194

Effective Date:

Expiration Date: (10 years from date of  
issuance.)

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Post-Closure Permit is hereby issued to USS-POSCO Industries. The issuance of this Permit is subject to the conditions set forth in Attachment A and the Part "A" Application dated May 22, 2001 and the Part "B" Application dated May 23, 2002. Attachment A of this permit consists of eight pages.

Mohinder S. Sandhu, Chief  
Standardized Permits and  
Corrective Action Branch  
Department of Toxic Substances Control

Date:

**ATTACHMENT "A"**  
**USS-POSCO INDUSTRIES**  
**900 LOVERIDGE ROAD, PITTSBURG, CA 94656**  
**NON-RCRA HAZARDOUS WASTE FACILITY POST-CLOSURE PERMIT**  
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**ATTACHMENT “A”  
PART I. DEFINITIONS**

1. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
2. **“Permittee”** as used in this Permit means the Owner and Operator.
3. **“CCR”** as used in this Permit means the California Code of Regulations.
4. **“CAMU”** as used in this Permit means Corrective Action Management Unit.
5. **“RCRA”** as used in this Permit means Resource Conservation and Recovery Act.
6. Unless explicitly stated otherwise, all references to items in this Permit shall refer only to items occurring within the same part.

## **PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP**

### **1. OWNER**

The owner of the facility is USS-POSCO Industries (hereafter "owner"), a joint venture (partnership) between United States Steel Corporation (formerly known as USX Corporation) of Pittsburgh, Pennsylvania and POSCO (formerly known as Pohang Iron and Steel Co., Ltd.) of Korea.

### **2. OPERATOR**

The operator of the facility is USS-POSCO Industries.

### **3. LOCATION**

The facility is located at 900 Loveridge Road, Pittsburg, Contra Costa County, California. Figure 1-2 of the Permit Application shows the legal boundaries of the facility.

### **4. DESCRIPTION**

The Unit One landfill, a capped and unlined non-RCRA unit, is located at the southern edge of Site L-B within the USS-POSCO facility. Unit One was granted an interim status in 1981 and was certified closed by DTSC on December 28, 1995. Unit One covers about eight acres, rises to a height of 39.5 feet above sea level, and contains approximately 130,800 cubic yards of wastes soils and sludges. Contaminants include metals, oil and grease, and total petroleum hydrocarbons. All wastes in the Unit One landfill are non-RCRA, California hazardous waste.

Creation of the Unit One CAMU will involve temporary removal of part of the cap on the Unit One landfill and placement of non-RCRA, California hazardous waste excavated from on-site Solid Waste Management Units (SWMUs). The Unit One CAMU shall cover approximately 10 acres, rise to a height of 48 feet above sea level, and contain an additional 98,400 cubic yards of waste soils and sludges. The opened cap shall be repaired with a geosynthetic clay liner and soils cover similar to the original cap on Unit One.

Drainage for the Unit One CAMU will be accomplished by natural gravity flow toward the north and west into the Storm Water Retention Basin. Lined culverts on the top deck collect storm water and direct it into pipes which convey it down the sides into a perimeter drainage channel. The drainage channel drains to the northwest into the Storm Water Retention Basin.

Required groundwater monitoring includes sampling of 3 upgradient and 6 downgradient wells. Monitoring frequency and parameters are as specified in Appendix One of this Permit and in the Operation Plan.

5. CAMU REGULATORY HISTORY AND BASIS FOR ISSUANCE OF PERMIT

In February 1993, the United States Environmental Protection Agency (USEPA) issued the final rule for CAMUs under Subtitle C (Federal Register, Volume 58, page 8658). California adopted regulations (California Code of Regulations, Title 22, Division 4.5, Chapter 14, Section 66264.552) equivalent to the federal CAMU rule on June 29, 1995.

These regulations allow placement of remediation/soil materials from on-site areas into a designated on-site CAMU, without complying with treatment standards specified by Land Disposal Restrictions for the waste, and without complying with liner standards specified by Minimum Technology Requirements for the unit receiving waste. The CAMU rule states that a liner system shall be installed and treatment be performed if necessary to protect human health and the environment. DTSC has determined that, for this project, neither a liner system nor treatment of the waste is necessary to protect human health and the environment.

The proposed amendments to the CAMU Rule were published in the Federal Register on August 22, 2000 (Volume 65, Number 163). CAMU applications submitted to the DTSC up to 90 days after this publication date and subsequently determined to be substantially complete are considered to be grandfathered and subject to the original 1993 CAMU Rule. DTSC received a CAMU Designation Request on August 4, 2000 and determined the CAMU Designation Request to be substantially complete on November 16, 2000. The final CAMU amendments were published in the Federal Register on January 22, 2002 (Volume 67, Number 14) and included the grandfathering regulations (40 CFR 264.550 and 551). Therefore the final amendments to the CAMU rule (liner and treatment requirements), effective as of April 22, 2002, do not apply.

6. FACILITY SIZE AND TYPE FOR FEES

The size of the facility is large for the purpose of activity fees associated with the Post-Closure Permit for the Corrective Action Management Unit.

### **PART III. CONDITIONS**

#### **1. PERMIT APPLICATION DOCUMENTS**

- (a) The approved Post-Closure Permit Application which consists of the Part A Application dated May 22, 2001 and Application for a Part B Permit dated May 23, 2002 are hereafter known as the Operation Plan. The Operation Plan is hereby made a part of this Permit by reference.

#### **2. EFFECT OF PERMIT**

- (a) The Permittee shall comply with the provisions of the California Health and Safety Code, and Division 4.5 of Title 22, California Code of Regulations. Specifically, the Permittee shall comply with all sections of the California Code of Regulations, division 4.5, title 22, chapter 14, article 14, with the exception of those sections dealing with liners and leachate collection systems. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit.
- (b) The Permittee is authorized to monitor and maintain the post-closure facility in accordance with the conditions of this Permit. Any treatment and storage of hazardous wastes not specifically authorized in this Permit or any other permits issued by DTSC is strictly prohibited.
- (c) Compliance with the terms of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
- (f) In addition, failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code of Regs., title

22, section 66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A Negative Declaration for this project has been prepared in the accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, Cal. Code Regs., title 14, section 15070 et seq.

4. ENVIRONMENTAL MONITORING

- a) The permittee is required to continue to perform groundwater monitoring in accordance with the requirements of Cal. Code Regs., title 22, division 4.5, chapter 14, article 6 and as specified in Operation Plan. Appendix 1 of this Permit lists the major components of the groundwater monitoring system, and monitoring parameters and frequency. Monitoring frequency is as follows: groundwater elevations on a quarterly basis; laboratory parameters and other field parameters semi annually for the first two years of the Unit I CAMU post-closure period. After the second year, the frequency would be changed to semi-annual for groundwater elevations and annual monitoring for all laboratory parameters and other field parameters if evaluation of the data justifies a longer time period between monitoring events (DTSC approval required.) Should the list of monitoring parameters be reduced in the future (DTSC approval required), the original list of monitoring parameters would be analyzed every five years.
- b) A visual inspection shall be conducted, at a minimum, on a monthly basis. Additional inspections shall be performed after 25 year 24 hour rainstorms, and after a significant earthquake (see Part 4(d)), or other events which may cause substantial damage to the Unit One CAMU. On a yearly basis, the Unit One CAMU shall have a comprehensive inspection as detailed in the Operation Plan. A independent engineer registered in California shall approve the evaluation. All inspections shall be conducted in accordance with Section 6.1, of the Operation Plan.
- c) Pursuant to Cal. Code Regs., title 22, section 66264.117(b)(1) the post-closure care period shall extend 30 years from the effective date of the permit. This period may be extended or shortened as provided in Cal. Code

Regs., title 22, section 66264.117 (b) (2)(A) and (B).

- d) A post-earthquake visual inspection shall be required according to the following table. The inspection must take place within three days of the earthquake. An inspection will be triggered when the earthquake is of “M” magnitude in the Richter scale and the earthquake epicenter is within a distance of “D” miles from the facility.

M	D		M	D		M	D		M	D
<4	see note		5.1	22		6.3	42		7.5	69
4.0	10		5.2	23		6.4	43		7.6	71
4.1	11		5.3	25		6.5	45		7.7	73
4.2	12		5.4	27		6.6	47		7.8	76
4.3	13		5.5	28		6.7	50		7.9	78
4.4	14		5.6	30		6.8	52		8.0	80
4.5	15		5.7	32		6.9	54		8.1	83
4.6	16		5.8	33		7.0	57		8.2	85
4.7	17		5.9	35		7.1	59		8.3	87
4.8	18		6.0	37		7.2	61		8.4	90
4.9	19		6.1	38		7.3	64		8.5	92
5.0	20		6.2	40		7.4	66			

note: For earthquakes less than 4.0 Richter magnitude, if significant damage has been reported within 10 miles radius from the facility, a post-earthquake inspection is required.



#### PART IV - CORRECTIVE ACTION

The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code section 25200.10. The Permitting is conducting corrective action pursuant to a Corrective Action Consent Agreement entered into between DTSC and the Permittee dated June 1998. This Consent Agreement shall be amended before the effective date of this Permit to include additional requirements for corrective action at the Facility.

## Appendix One

### Unit One CAMU Groundwater Monitoring Wells and Piezometers Construction Summary, Monitoring Parameters and Frequency

Number	Hydrogeologic Status	Monitoring Interval	Dia-meter inches	Total Depth (ft bgs)	Screen Interval (ft bgs)
M-0IDR	Upgradient	Deep	4	119	108 to 118
M-01F	Upgradient	Intermediate	2	56	45 to 55
M-01GR	Upgradient	Shallow	2	19	8 to 18
M-02	Downgradient	Shallow	2	19	9 to 19
M-03	Downgradient	Shallow	2	18	8 to 18
M-04	Downgradient	Intermediate	2	53	43 to 53
M-04D	Downgradient	Deep	4	118	108 to 118
M-04S	Downgradient	Shallow	2	17	6 to 16
M-05	Downgradient	Shallow	2	20	10 to 20
M-10	Downgradient	Shallow	2	19.5	9.5 to 19.5

Notes: bgs = below ground surface

(a) Monitoring Intervals: The shallow and intermediate intervals monitor the upper groundwater-bearing zone and the deep interval monitors the lower groundwater-bearing zone.

#### (b) Monitoring Parameters

##### Field Parameters

Groundwater elevation; pH; Specific Conductance; Temperature; Turbidity

##### Laboratory Parameters

Metals (arsenic, chromium, copper, lead, manganese, nickel, zinc) (EPA Method 6000 series); TDS (EPA Method 160.1); TOC (EPA Method 415.1); TPH-d and TPH-g (EPA Method 8015M); O&G (EPA Method 413.2); VOCs (EPA Method 8260)

#### (c) Monitoring frequency:

Groundwater elevations on a quarterly basis; laboratory parameters and other field parameters semi-annual for the first two years of the Unit I CAMU post-closure period. After the second year, the frequency would be changed to semi-annual for groundwater elevations and annual monitoring for all laboratory parameters and other field parameters if evaluation of the data justifies a longer time period between monitoring events (DTSC approval required.) Should the list of monitoring parameters be reduced in the future (DTSC approval required), the original list of monitoring parameters would be analyzed every five years.